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Attorneys for Defendants
Wynn Las Vegas, LLC and Wynn Resorts, Ltd.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No.

**NOTICE TO FEDERAL COURT OF
REMOVAL OF CIVIL ACTION FROM
STATE COURT**

Pursuant to 28 U.S.C. § 1332(d), Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd. hereby notify the Court of the removal of *BRENNA SCHRADER, an individual, on behalf of herself and all others similarly situated, v. STEPHEN ALAN WYNN; an individual; MAURICE WOODEN, an individual, WYNN LAS VEGAS, LLC dba WYNN LAS VEGAS a Nevada Limited Liability, WYNN RESORTS, LTD, a Nevada Limited Liability Company; and DOES 1-20, inclusive; ROE CORPORATIONS 1-20, inclusive*, Case No. A-19-802598-C, which was filed in the Eighth Judicial District Court in Clark County, Nevada. In support of said removal, Defendants state as follows:

1 1. On September 26, 2019, an action was commenced in the Eighth Judicial District
2 Court of Clark County, Nevada, entitled *BRENNA SCHRADER, an individual, on behalf of*
3 *herself and all others similarly situated, v. STEPHEN ALAN WYNN; an individual; MAURICE*
4 *WOODEN, an individual, WYNN LAS VEGAS, LLC dba WYNN LAS VEGAS a Nevada Limited*
5 *Liability, WYNN RESORTS, LTD, a Nevada Limited Liability Company; and DOES 1-20,*
6 *inclusive; ROE CORPORATIONS 1-20, inclusive.* A copy of the Complaint is attached hereto as
7 **Exhibit A.**

8 2. Defendants Wynn Las Vegas, LLC and Wynn Resorts, Ltd. were served on
9 November 25, 2019 with a copy of the Complaint and a Summons issued by the state court on or
10 about September 27, 2019. A copy of the Summonses are attached hereto as **Exhibit B.**

11 3. Plaintiffs attempted to serve Defendant Stephen Alan Wynn (Mr. Wynn) on
12 December 11, 2019, with a copy of the Complaint and a Summons issued by the state court on or
13 about September 27, 2019. An affidavit of service was filed as to that attempt, and Mr. Wynn's
14 Counsel has offered to accept service. A copy of the Summons is not yet available on the Court's
15 website.

16 4. Defendant Maurice Wooden (Mr. Wooden) was served on December 12, 2019
17 with a copy of the Complaint and a Summons issued by the state court on or about September 27,
18 2019. A copy of the Summons is not yet available on the Court's website.

19 5. Undersigned Counsel communicated with Counsels for individually named
20 defendants Mr. Wynn and Mr. Wooden, on December 13, 2019, regarding removal of this case,
21 and understands they intend to file consents to removal when they appear in this case.

22 6. This action is properly removed to federal court under federal question jurisdiction
23 because Plaintiff's Complaint contains claims which arise under federal law, specifically, Title
24 VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, the Fair Labor Standards Act, 29. U.S.C.
25 § 201 *et. seq.*, Forced Labor, 18 U.S.C. § 1589, and Federal Racketeering Influenced and Corrupt
26 Organizations (RICO), 18 U.S.C. § 1962. *See* 28 U.S.C. § 1441.

7. This Notice of Removal is being filed within thirty (30) days of receipt of any pleadings setting forth the claim for relief upon which the action is based and is, therefore, timely under 28 U.S.C. § 1331 and § 1446(b).

8. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this court pursuant to the provisions of 28 U.S.C. § 1441(a), in that it is a civil action arising under the Constitution, laws, or treaties of the United States. Specifically, Plaintiff alleges conduct in violation of the Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, the Fair Labor Standards Act, 29. U.S.C. § 201 *et. seq.*, Forced Labor, 18 U.S.C. § 1589, and Federal Racketeering Influenced and Corrupt Organizations (RICO), 18 U.S.C. § 1962. Any remaining state law claims are also properly removed pursuant to the Court's supplemental jurisdiction. 28 U.S.C. § 1367(a).

9. Venue is proper in this Court as this is the court for the district and division embracing the place where the action is pending in state court. 28 U.S.C. § 1391.

WHEREFORE, Defendants pray that the above-referenced action now pending in the Eighth Judicial District Court of the State of Nevada in and for the County of Clark be removed therefrom to this Court.

Dated this 16th day of December, 2019.

JACKSON LEWIS P.C.

/s/ Deverie J. Christensen
Deverie J. Christensen, Bar #5837
Joshua A. Sliker, Bar #12493
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

*Attorneys for Defendants
Wynn Las Vegas, LLC and Wynn Resorts,
Ltd.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 16th day of December, 2019, I caused to be served via the Court's CM/ECF Filing, a true and correct copy of the above foregoing **NOTICE TO FEDERAL COURT OF REMOVAL OF CIVIL ACTION FROM STATE COURT** properly addressed to the following:

Richard Harris, Esq.
Benjamin Cloward, Esq.
Burke Huber, Esq.
Richard Harris Law Firm
801 South Fourth Street
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Attorneys for Plaintiff

Tamara Beatty Peterson
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Attorney for Stephen Alan Wynn

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Attorney for Maurice Wooden

/s/ Kelley Chandler
Employee of Jackson Lewis P.C.

4843-9118-7118, v. 1